

EXHIBIT B

VIRGINIA:

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

CGH Technologies, Inc.

Plaintiff (email adean@grddlaw.com)Case No. CL25-2285

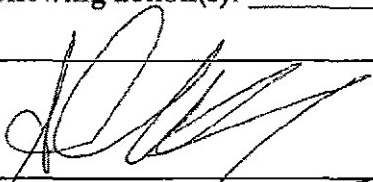
v.

Glyn Owen, et al.

Defendant (email _____)

MOTIONS DAY PRAECIPE/NOTICE☒ IN PERSON ☐ WEBEX

The Clerk of said Court will please place the above-referenced case on the Civil Motion's
Day docket to be called on Friday August 29, 2025 at 10:30a.m. for the
following action(s): Motion to Lift Stay and Reissue Rule to Show Cause



Signature

Printed Name: A. Charles Dean, VSB # 74814Address: 3975 University Drive, Suite 410, Fairfax, VA 22030Phone: 703-273-1400CERTIFICATE OF SERVICE

X I CERTIFY that I have in good faith conferred or attempted to confer with other affected parties in an effort to resolve the subject of the motion without Court action and to determine a mutually agreeable hearing date and time, pursuant to Rule 4:15(b) of the Rules of the Supreme Court of Virginia.

X I CERTIFY that on the 7th day of August, 2025, I sent a copy of the foregoing to opposing party/counsel by X Mail ☐ Fax ☐ Hand Delivery.

List the name, address, phone number for opposing party/counsel:

Same as Certificate of Service on attached Motion



Signature

Printed Name: A. Charles Dean, VSB # 74814Address: 3975 University Drive, Suite 410, Fairfax, VA 22030Phone: 703-273-1400

Mail or Deliver original to: Clerk of the Circuit Court - 9311 Lee Ave, Rm 314
Manassas, VA 20110 - (703) 792-6029

OR

Email to circuitcourt@pwccgov.org

VIRGINIA

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

CGH TECHNOLOGIES, INC.

Plaintiff,

v.

GLYN OWEN, et al.

Defendants.

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CL25-2285

MOTION TO LIFT STAY AND REISSUE RULE TO SHOW CAUSE

COMES NOW the Plaintiff CGH Technologies, Inc. (hereinafter "Plaintiff" or "CGH"), by counsel, and files this Motion to Lift the Stay and Reissue Rule to Show Cause, stating to this Honorable Court as follows.

1. Plaintiff commenced this matter with the filing of a Suggestion for Summons in Garnishment. A Garnishment Summons was served upon the Garnishee, The Prudential Insurance Company on or about March 14, 2025.
2. The Garnishee failed to answer the Garnishment Summons as required by law and a Show Cause Order against the Co-Defendant was entered by this Court on May 9, 2025 with a return date of July 11, 2025
3. The Show Cause Order was never served on the Garnishee and the hearing on the Show Cause Order did not take place due to the Judgment Debtor's bankruptcy filing.
4. A stay was entered in this matter on July 14, 2025 based upon the Debtor's filing of a bankruptcy petition. As evidenced by the Agreed Order on Motion to Extend Automatic Stay entered by the United States Bankruptcy Court for

the Eastern District of Virginia (and attached hereto as Exhibit "A"), the automatic stay is inapplicable to Plaintiff's claims against the Garnishee, The Prudential Insurance Company, in this matter.

5. Based upon the Judgment Debtor's filings in the bankruptcy proceeding, the Plaintiff has reason to believe that the Garnishee may have paid funds directly to the Judgment Debtor after service of the Garnishment Summons. If the Garnishee did make such payment, it would subject the Garnishee to direct liability to the Plaintiff. *See, e.g., Suntrust Bank v. PS Bus. Parks, L.P.*, 292 Va. 644 (2016).

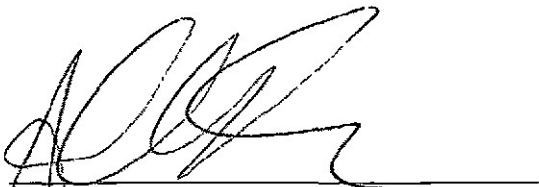
6. Plaintiff is entitled to pursue its potential claims against the Garnishee and is entitled to a response to the Garnishment Summons from the Garnishee.

Accordingly, reissuance of the Show Cause Order is the appropriate remedy.

WHEREFORE, Plaintiff prays that this Honorable Court enter an Order lifting the stay applicable to this matter so that Plaintiff can pursue its claims against the Garnishee, The Prudential Insurance Company and further that this Honorable Court a Show Cause Order against the Co-Defendant compelling a response to the Garnishment Summons.

Respectfully submitted,

CGH TECHNOLOGIES, INC.
By Counsel



Jeffrey S. Romanick, VA Bar #34761
A. Charles Dean, VA Bar #74814
GROSS, ROMANICK, DEAN & DESIMONE, P.C.
3975 University Drive, Suite 410
Fairfax, VA 22030
(703) 273-1400 (telephone)
(703) 385-9652 (facsimile)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

	X	
In re:	:	Chapter 11
	:	
Glyn Neal Owen	:	No. 25-11132-KHK
	:	
Debtor.	:	
	:	
	X	

AGREED ORDER ON MOTION TO EXTEND AUTOMATIC STAY

Upon consideration of the Motion of the Debtor pursuant to section 362(c)(3)(B) for an order continuing the automatic stay provided under section 362(a) as to all creditors, and the objection thereto filed by CGH Technologies, Inc. ("CGH"), and upon consideration of the Affidavit of the Debtor and the agreement of CGH to the terms of this Order, the Court finds that the Debtor has shown by the requisite standard of proof that the filing of this case is in good faith as to all creditors; and it

APPEARING that the Debtor agrees that CGH's direct actions against Bank of America and The Prudential Insurance Company as Garnishees are not stayed and, to the extent stayed, will not be protected by this extension of the stay, nor will he contest such direct actions or claim any exemption in this case in CGH's recoveries therein, accordingly, it is hereby

ORDERED that the automatic stay under 11 U.S.C. § 362(a) be continued and shall remain in effect as to all creditors for the duration of this case, without prejudice to any relief that may be granted on motion pursuant to 11 U.S.C. § 362(d), EXCEPT


Daniel M. Press, VSB# 37123
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
Counsel for Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion was sent via first class, postage pre-paid mail to:

William D. Wides, Esq.
COMPTON & DULING, PLC
12701 Marblesstone Drive, Suite 350
Prince William, VA 22192
wdw@comptonduling.com

The Prudential Insurance Company
c/o CT Corporation-System, Registered Agent
4701 Cox Road, Suite 285
Glen Allen, VA 23060


A. Charles Dean

THAT the stay of § 362(a), shall not be applicable to, and CGH may continue to pursue Bank of America and The Prudential Insurance Company for any liability they have to CGH, including without limitation through its previously filed garnishment proceedings against them as Garnishces, respectively, in Case No. CL24-2946 and in Case No. CL25-2285, pending in the Circuit Court of Prince William County, Virginia.

Dated: Jul 1 2025

/s/ Klinette H Kindred
Judge, U.S. Bankruptcy Court

Entered on Docket: Jul 1 2025

I ASK FOR THIS:

/s/ Daniel M. Press

Daniel M. Press, VSB 37123
CHUNG & PRESS, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
Counsel for the Debtor

SEEN AND AGREED:

/s/ Steven B. Ramsdell

Steven B. Ramsdell, VSB 33222
Tyler, Bartl & Ramsdell, P.L.C.
300 N. Washington St., Suite 310
Alexandria, VA 22314
(703) 549-5003
Counsel for CGH Technologies, Inc.

SEEN:

/s/ Katharine Toledo

Office of the U.S. Trustee

Local Rule 9022-1(C) Certification

The foregoing Order was endorsed by and/or served upon all necessary parties pursuant to Local Rule 9022-1(C).

/s/Daniel M. Press

Daniel M. Press

Importance: normal

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We received the attached form in our workflow, but we are unable to identify the participant in the system. Would you be able to assist us with locating the correct SSN or area this document should be imaged to?

Thank you,

Christina Lloyd, Document Management | Operations Support Specialist
Empower

303-737-3714 direct | 860-752-2781 mobile | christina.lloyd@empower.com

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